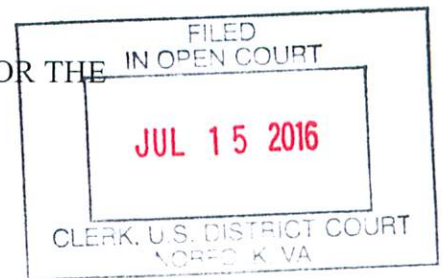


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Norfolk Division



UNITED STATES OF AMERICA)

v.)

GENESIS C. MOORE,)

Defendant.)

CRIMINAL NO. 2:16CR38

STATEMENT OF FACTS

The United States and the defendant, GENESIS C. MOORE ("MOORE"), agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. At all times relevant to this statement of facts, the defendant, MOORE, was an active duty member of the United States Navy stationed on the USS Wasp (LHD-1), at Naval Station Norfolk, Virginia, in the Eastern District of Virginia.

2. On or about May 4, 2015, the defendant, MOORE, knowingly stole a black Continental Trailer, Vehicle Identification Number 5NHUNS620DU104801, and the contents therein from the Morale, Welfare, and Recreation (MWR) Department on Naval Station Norfolk, Virginia. The trailer contained fitness equipment belonging to the MWR Department. The defendant, MOORE, had no permission or authority to use this trailer or remove it from Naval Station Norfolk. The value of the trailer and its contents exceeded \$1,000.

3. On or about June 7, 2015, the defendant, MOORE, removed a 2.5 ton diesel freightliner flatbed truck, Government License Plate No. N9647374, from the pier at Naval Station Norfolk, Virginia. The freightliner had been at the pier for use by U.S. Navy members assigned

A handwritten signature in blue ink, appearing to be "Mo".

Handwritten initials and a signature in blue ink. The initials "ACC" are at the top, "KCK" is below them, and a signature "C. Moore" is at the bottom right.

to the USS Harry S. Truman (CVN-75). The defendant, MOORE, had no permission or authority to use this truck or remove it from Naval Station Norfolk. The value of the truck exceeded \$1,000.

4. On or about June 7, 2015, the defendant, MOORE, transported, and/or caused to be transported, the freightliner flatbed truck referenced in paragraph 3, a Bobcat T250 (serial number 531813296), and a Bobcat T190 (serial number 527717735), from the Eastern District of Virginia to Loganville, Georgia. The Bobcat T250 belonged to Winn Nursery, a company located in Newport News, Virginia. The Bobcat T250 had been stolen from its owner, Winn Nursery. The defendant, MOORE, knew the Bobcat vehicle to be stolen when he transported it and/or caused it to be transported. Mr. Moore possessed the stolen flatbed truck and the Bobcat T250 on or about June 8, 2016 in Loganville, Georgia - knowing them to have been stolen. Once in Loganville, Georgia, the defendant attempted to sell the stolen Bobcat T250, belonging to Winn Nursery, to an individual residing in Loganville, Georgia. The defendant was apprehended by the Loganville, Georgia Police Department. The Bobcat T250 was recovered and returned to its owner.

5. The Bobcat T250, serial number 531813296, belonging to Winn Nursery, was stolen again on or about July 6, 2015. On or about July 6, 2015, the defendant, MOORE, possessed the same Bobcat T250, in the Eastern District of Virginia, knowing it to be stolen. On or about July 6, 2015, the defendant, MOORE, attempted to sell the stolen Bobcat T250 to J.B., an individual residing in Easley, South Carolina, via a Craigslist advertisement. At the defendant's request, and as consideration for the purchase of the Bobcat T250, J.B. wired \$200 from a Walmart store located in South Carolina to a Walmart store located in Hampton, Virginia, to be paid to Genesis Calvin Moore. J.B. traveled from South Carolina to Hampton, Virginia, where he



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purchased the Bobcat T250 from MOORE and returned with the Bobcat to South Carolina. J.B. told MOORE that he intended to bring the Bobcat T250 back to South Carolina with him.

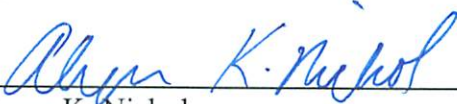
6. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the United States. It does not include each and every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

7. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,

Dana J. Boente
United States Attorney

By:



Alyssa K. Nichol
Special Assistant United States Attorney




KLR

G.M.
AKW

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, GENESIS C. MOORE, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



GENESIS C. MOORE

I am the defendant's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.



Attorney for GENESIS C. MOORE



KCK
xcc
G.M.
AW